

EXHIBIT G

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

| Plaintiffs' Executive Committee for Personal Injury and Death Claims | Plaintiffs' Executive Committee for Commercial Claims |
|---|--|
| Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP | Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR |
| Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haeefe, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC | J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR |

VIA EMAIL

June 4, 2018

Alan R. Kabat, Esq.
Bernabei & Kabat, PLLC
1400 16th Street, N.W.
Suite 500
Washington, D.C. 20036-2223

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Alan:

Enclosed please find Notices of Deposition for your clients Adnan Basha, Abdullah Omar Naseef, Abdullah bin Saleh al Obeid, Abdullah bin Abdul Mohsen al Turki, and Soliman al-Buthe. In accordance with the Deposition Protocol endorsed by the Court, we have scheduled these depositions to be conducted in London, and in deference to the defendants' religious observations, have set them for dates well after Ramadan and the Eid holiday. As you know, we presently are scheduled to conduct the deposition of defendant Yassin al Kadi in London on July 10 and 11, and consistent with the Court's directive that the parties seek to schedule depositions in batches to promote efficiency, have set the depositions of these witnesses for dates following that of Mr. Kadi.

We are amenable to conducting the depositions of these defendants in any order that is convenient for the defendants during the dates specified in the Notices. Thus, if your clients would like to rearrange the sequence of their appearances for deposition during the dates specified in the Notices, we are amenable to taking them in the order in which they would prefer to appear. We would, however, ask that you confirm the order by Wednesday of this week.

Finally, we note that we have been seeking dates for the depositions of these defendants since early February, and despite numerous written and verbal follow up requests, you never provided a single available date for any of these witnesses to appear for deposition. Accordingly, to the extent that you claim that any of the witnesses is unavailable to appear within the date range specified in the Notices, we would ask that you provide the following

Alan R. Kabat, Esq.

June 4, 2018

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information by the close of business on Wednesday of this week: (1) the specific nature of the conflict that allegedly prevents the witness from appearing for deposition within the date range specified; (2) a list of all alternative available dates on which the witness would be available to appear for deposition between July 12, 2018 and September 30, 2018; (3) the date on which you last successfully communicated with any witness who purports to be unavailable during the relevant date range concerning his availability for deposition; and (4) whether you are in a position to affirmatively represent that each of the witnesses intends to appear for a deposition in this matter.

We look forward to hearing back from you by no later than Wednesday concerning the depositions of these defendants.

Regards,

COZEN O'CONNOR

A handwritten signature in blue ink, appearing to read "Sean P. Carter", with a long horizontal flourish extending to the right.

By: Sean P. Carter, on behalf of the PECs

SPC/bdw

Enclosures

cc: Members of Plaintiffs' Executive Committees (via Email)
Members of Defendants' Executive Committee (via Email)

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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| In re Terrorist Attacks on September 11, 2001 | 03 MDL 1570 (GBD) (SN) ECF Case |
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This document relates to: *All Actions*

NOTICE OF DISCOVERY DEPOSITION

PLEASE TAKE NOTICE that on July 12, 2018, beginning at 8:30 a.m. GMT and lasting until 4:30 p.m. GMT, and continuing on July 14, 2018, beginning at 8:30 a.m. GMT and lasting until 12:00 p.m. GMT, at the law offices of Cozen O'Connor, 140 Fenchurch Street, Third Floor, London, EC3M 6BL, United Kingdom, the undersigned, for the Plaintiffs' Executive Committees in the above-captioned matter, will take the oral discovery deposition of ABDULLAH OMAR NASEEF pursuant to Federal Rule of Civil Procedure 30. The discovery deposition will be recorded by stenographic means and will be videotaped.

The discovery deposition will proceed in accordance with the Federal Rules of Civil Procedure and will relate to all actions.

Dated: June 4, 2018

Respectfully submitted,

/s/ Sean P. Carter
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
COZEN O'CONNOR
1650 Market Street, 28th Floor
Philadelphia, PA 19103
Tel: (215) 665-2000

*Attorneys for the Plaintiffs' Executive
Committees*

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2018, I caused a copy of the foregoing Notice of Discovery Deposition to be served by email upon the following for their further distribution to counsel for all parties in this action:

Jodi Westbrook Flowers, Esq.
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/s/

J. Scott Tarbutton, Esq.

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SOUTHERN DISTRICT OF NEW YORK**

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PLEASE TAKE NOTICE that on July 15, 2018, beginning at 8:30 a.m. GMT and lasting until 4:30 p.m. GMT, and continuing on July 16, 2018, beginning at 8:30 a.m. GMT and lasting until 12:00 p.m. GMT, at the law offices of Cozen O'Connor, 140 Fenchurch Street, Third Floor, London, EC3M 6BL, United Kingdom, the undersigned, for the Plaintiffs' Executive Committees in the above-captioned matter, will take the oral discovery deposition of ABDULLAH AL TURKI pursuant to Federal Rule of Civil Procedure 30. The discovery deposition will be recorded by stenographic means and will be videotaped.

The discovery deposition will proceed in accordance with the Federal Rules of Civil Procedure and will relate to all actions.

Dated: June 4, 2018

Respectfully submitted,

/s/ Sean P. Carter
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/s/

J. Scott Tarbutton, Esq.

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PLEASE TAKE NOTICE that on July 17, 2018, beginning at 8:30 a.m. GMT and lasting until 4:30 p.m. GMT, and continuing on July 18, 2018, beginning at 8:30 a.m. GMT and lasting until 12:00 p.m. GMT, at the law offices of Cozen O'Connor, 140 Fenchurch Street, Third Floor, London, EC3M 6BL, United Kingdom, the undersigned, for the Plaintiffs' Executive Committees in the above-captioned matter, will take the oral discovery deposition of ABDULLAH AL OBAID pursuant to Federal Rule of Civil Procedure 30. The discovery deposition will be recorded by stenographic means and will be videotaped.

The discovery deposition will proceed in accordance with the Federal Rules of Civil Procedure and will relate to all actions.

Dated: June 4, 2018

Respectfully submitted,

/s/ Sean P. Carter
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
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*Attorneys for the Plaintiffs' Executive
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/s/

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PLEASE TAKE NOTICE that on July 19, 2018, beginning at 8:30 a.m. GMT and lasting until 4:30 p.m. GMT, and continuing on July 21, 2018, beginning at 8:30 a.m. GMT and lasting until 12:00 p.m. GMT, at the law offices of Cozen O'Connor, 140 Fenchurch Street, Third Floor, London, EC3M 6BL, United Kingdom, the undersigned, for the Plaintiffs' Executive Committees in the above-captioned matter, will take the oral discovery deposition of ADNAN BASHA pursuant to Federal Rule of Civil Procedure 30. The discovery deposition will be recorded by stenographic means and will be videotaped.

The discovery deposition will proceed in accordance with the Federal Rules of Civil Procedure and will relate to all actions.

Dated: June 4, 2018

Respectfully submitted,

/s/ Sean P. Carter
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
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/s/

J. Scott Tarbutton, Esq.

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PLEASE TAKE NOTICE that on July 22, 2018, beginning at 8:30 a.m. GMT and lasting until 4:30 p.m. GMT, and continuing on July 23, 2018, beginning at 8:30 a.m. GMT and lasting until 12:00 p.m. GMT, at the law offices of Cozen O'Connor, 140 Fenchurch Street, Third Floor, London, EC3M 6BL, United Kingdom, the undersigned, for the Plaintiffs' Executive Committees in the above-captioned matter, will take the oral discovery deposition of SOLIMAN H.S. AL BUTHE pursuant to Federal Rule of Civil Procedure 30. The discovery deposition will be recorded by stenographic means and will be videotaped.

The discovery deposition will proceed in accordance with the Federal Rules of Civil Procedure and will relate to all actions.

Dated: June 4, 2018

Respectfully submitted,

/s/ Sean P. Carter
Sean P. Carter, Esq.
J. Scott Tarbutton, Esq.
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